

**BLAIR & ROACH, LLP***Attorneys*

2645 SHERIDAN DRIVE  
TONAWANDA, NEW YORK 14150  
PHONE: 716-834-9181 • FAX: 716-834-9197

July 31, 2008

**VIA TELECOPY ONLY**  
**(212-805-6326)**

Hon. Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 640  
New York, NY 10007

**MEMO ENDORSED**

Re: Park Avenue Consulting Group v. Newgold, Inc., et al.  
08 Civ. 1850 (CM) (GWG)

Dear Judge McMahon:

Please accept this letter as a joint request for an adjournment/extension of time with respect to the above matter. The parties are requesting an additional sixty (60) days be added to the remaining time periods set forth in the Civil Case Management Plan entered by Your Honor on April 1, 2008.

In accordance with Rule 1(E) of Your Honor's Individual Practices, a proposed Revised Scheduling Order is enclosed. In addition, the following information is provided:

(1) Original Dates:

(a) Completion of Discovery	August 29, 2008
(b) Plaintiff's Expert Report	July 31, 2008
(c) Defendants' Expert Report	August 15, 2008
(d) Joint pre-trial order	October 14, 2008

(2) No previous requests for an adjournment or extension have been made by either party.

(3) N/A.

(4) This is a joint request for an extension of time. Both parties consent to the requested extension.

Thank you for your consideration.

Respectfully submitted,

BLAIR &amp; ROACH, LLP

By:   
J. Michael Lennon

JML:m

Enclosure

cc: David F. Filler, Esq. (via telecopy only 718-340-3615)

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/1/08